

## **Exhibit A**

Pursuant to *Tronox Inc. v. Kerr-McGee Corp.*, Adv. Proc. No. 09-01198 (Bankr. S.D.N.Y.), settlement funds (“Settlement Funds”) were to be set aside to “enable the investigation, remediation, cleanup, and recovery of natural resource damages and other compensation with respect to certain environmental sites.” Id. at 5. We understand that there is a group of stakeholders directing the use and disbursement of the Settlement Funds (“Stakeholder Group”). Specifically with respect records pertaining to the West Study Area of the San Mateo Creek Basin, we are respectfully requesting any and all records—including, but not limited to, emails, memoranda, reports, meeting minutes, and transcripts—related to the composition and workings of the Stakeholder Group including, but not limited to, the following:

- the Stakeholder Group’s composition;
- the Stakeholder Group’s decision criteria;
- any informal or formal agreements between the Stakeholder Group’s members;
- any meeting minutes or notes from meetings of the Stakeholder Group or that group’s members;
- any records concerning which party is leading the Stakeholder Group;
- any records concerning the spending of Settlement Funds, including, without limitation, restrictions on the use of those funds;
- any records related to EPA’s methodology for prioritizing spending of the Settlement Funds;
- an accounting of how the Settlement Funds have been spent to date; and
- any other available records concerning the workings or decisions of the Stakeholder Group.

Please do not hesitate to contact us with any questions regarding this records request.